



**U.S. Department of Justice**

*United States Attorney  
Eastern District of New York*

SK  
F. #2016R02228

*271 Cadman Plaza East  
Brooklyn, New York 11201*

January 29, 2020

By Email and ECF

Andrew J. Frisch  
One Penn Plaza, Suite 5315  
New York, NY 10119

Re: United States v. Aleksandr Zhukov  
Criminal Docket No. 18-633 (ERK)

Dear Mr. Frisch:

The government previously notified the defendant, by letter dated January 27, 2020, that it intended to call an industry expert as an expert witness in its case-in-chief at trial. Enclosed please find a curriculum vitae for that expert (3500-LR-1), which is designated **sensitive discovery material** pursuant to the protective order issued by the Court on July 31, 2019. The government also hereby provides written notice that it intends to offer business records provided by DomainTools via certification pursuant to Federal Rule of Evidence 902(11). The certification, and the records to which it pertains, were previously produced to you by letter dated May 1, 2019, in the file folder Bates-stamped ZHU000013.

Very truly yours,

RICHARD P. DONOGHUE  
United States Attorney

By: /s/  
Saritha Komatireddy  
Michael T. Keilty  
Alexander F. Mindlin  
Assistant U.S. Attorneys  
(718) 254-7000

Enclosure

cc: Clerk of the Court (ERK) (by ECF) (without enclosure)